

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DALTON LEE JUICK KONAT

Defendant.

CASE NO. _____

JUDGE

INDICTMENT

THOMAS M. ROSE

18 U.S.C. §§2251(a) and (e)

18 U.S.C. §§2252(a)(4)(B) and (b)(2)

FORFEITURE ALLEGATION

FILED
RICHARD W. NAGEL
CLERK OF COURT
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U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WESTERN DIV. DAYTON

3:18 cr 016

THE GRAND JURY CHARGES:

COUNT 1

[18 U.S.C. §§2251(a) and (e)]

On or about October 16, 2017, in the Southern District of Ohio, the defendant, **DALTON LEE JUICK KONAT**, did employ, use, persuade, induce, entice, and coerce a minor (whose identity is known to the Grand Jury and is referred to herein as "Minor A") to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and that visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

In violation of 18 U.S.C. §§2251(a) and (e).

COUNT 2

[18 U.S.C. §§2252(a)(4)(B) and (b)(2)]

On or about January 26, 2018, in the Southern District of Ohio, the defendant, **DALTON LEE JUICK KONAT**, knowingly possessed one or more matters which contained visual depictions that were produced using materials which had been mailed, shipped and transported in

interstate and foreign commerce, by any means including by computer, and the production of such visual depictions involved the use of a minor who had not attained 12 years of age (Minor A), engaging in sexually explicit conduct, and such visual depictions were of such conduct.

In violation of 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2).

FORFEITURE ALLEGATION

Upon conviction of Counts One and/or Two of this Indictment, the defendant, **DALTON LEE JUICK KONAT**, shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a), his interest in (1) any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18 of the United States Code, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18 of the United States Code; (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense and any property traceable to such property, including but not limited:

- a. ZTE Model Z899VCB cellular telephone with Serial Number 32F476816786
- b. Sandisk SD Card (red and gray in color)

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b), to seek forfeiture of any other property of said defendant, up to the value of the forfeitable property described above.

A TRUE BILL

1st signed
FOREPERSON

BENJAMIN C. GLASSMAN
UNITED STATES ATTORNEY

Andrew R. Picek
ANDREW R. PICEK (0082121)
Special Assistant United States Attorney